

Exhibit A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*

Debtors.

Chapter 11 Case No.

Case No. 08-13555 (JMP)

(Jointly Administered)

**PROPOSED ORDER GRANTING THE MOTION OF TRAXIS FUND LP AND
TRAXIS EMERGING MARKET OPPORTUNITIES FUND LP TO COMPEL
DEBTORS TO REISSUE DISTRIBUTION CHECKS FOR ALLOWED CLAIMS**

Upon consideration of the Motion of Traxis Fund LP and Traxis Emerging Market Opportunities Fund LP (together, the “Movants”) to Compel Debtors to Reissue Distribution Checks for Allowed Claims (the “Motion”), and due notice thereof having been provided as set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures dated February 13, 2009 entered in these proceedings; and it appearing that no other or further notice of the Motion need be provided; and having considered the Motion and any objections thereto; and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted in its entirety. To the extent any objections to the Motion have not been withdrawn or otherwise resolved, they are hereby overruled.
2. The Movants’ request that the debtors in the above-captioned bankruptcy case (the “Debtors”) reissue certain distribution checks relating to Claim Nos. 66512, 66511, 66510 and 66509, originally issued on or about April 17, 2012 (the “Distribution Checks”), shall be deemed timely under Paragraph 8.11 of the Modified Third Amended Joint Chapter 11 Plan

of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, dated December 5, 2011 (the “Plan”).

3. The Debtors shall, as soon as is practicable, furnish payment to the Movants of the full amount of the Distribution Checks in a manner to be mutually agreed upon by the Movants and the Debtors.

4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: December [____], 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE